

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHRISTINE COIL,

Plaintiff,

v.

WALLACE PAVING, INC.,

Defendant.

Case No. 13-cv-08688

Magistrate Judge Young B. Kim

JOINT MOTION TO APPROVE SETTLEMENT

Plaintiff, Christine Coil, and Defendant, Wallace Paving, Inc. (collectively, the “Parties”), by and through their undersigned counsel, hereby move this Court to approve the Parties settlement of this action and state as follows:

1. Plaintiff filed this action on December 5, 2013 stating a single cause of action for violations of the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 201, *et seq.* and Defendant answered the complaint on January 24, 2014.
2. The Parties have diligently negotiated in good faith to reach a settlement of Plaintiff’s claim and have, in fact, reached a mutually agreeable settlement.
3. The Parties mutually agree that the settlement reached presents a fair and reasonable resolution of Plaintiff’s claims without the need for further litigation.
4. Pursuant to the provisions of the FLSA, the Parties now jointly move this Court for approval of the settlement, submitted to the Court for *in camera* review as Exhibit 1.
5. Upon the Court’s approval of the proposed settlement, the parties intend to file a joint stipulated motion to dismiss this action.

WHEREFORE Plaintiff, Christine Coil, and Defendant, Wallace Paving, Inc., respectfully move this Court to approve the Parties' proposed settlement.

Dated: August 1, 2014

On behalf of Plaintiff,

By: /s/ Ethan E. White
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On behalf of Defendant,

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Exhibit 1

(submitted directly to chambers for *in camera* review only)